

I support RM-10867, the proposal for amateur radio service restructuring, submitted by the American Radio Relay League.

Of those proposals submitted to the Commission, RM-10867 best addresses the future needs of the amateur service. The proposal for a new HF entry-level license is visionary in its approach both in terms of privileges proposed as well as testing requirements.

Enactment of such an entry-level license could spur growth in the amateur service by as much as 5 percent for the first two years after its implementation followed by a steady growth rate thereafter of 3-4 percent, in my opinion. I am an Extra class licensee and have been licensed since 1969. I believe a new entry-level HF license, as based on ARRL's proposal, would attract a good mix of new licensees to the amateur service as well as bring many now inactive amateurs back to the airwaves. (The only negative aspect to the ARRL proposal is the name "novice" which by today's standards seems needlessly negative in context. I suggest the term "Basic" conveys the right description for this license class.

Although it's clear to me that the future of the amateur radio service no longer hinges on manual Morse telegraphy, it makes reasonable sense to continue it as a requirement for the highest class of amateur license. As such, continuation of the 5 wpm Morse requirement for the Extra class only is appropriate. In this manner, two-thirds of the amateur service license classes would no longer mandate Morse while the skills levels of Morse users would not be lost to the amateur service in the years ahead. It not only offers a good compromise on the long-divise issue of "code vs. no code" in the amateur service but it makes good sense to keep it as a licensing requirement for the smallest -- in terms of numbers -- but the highest grade of license, whose operators presumably represent that group of amateurs with the highest levels of on-air and operating expertise.

In closing, I hope the Commission adopts RM-10867 in full and without substantive modification.

Respectfully submitted,
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